

Exhibit 21



ELECTION INITIATIVES

Inaccurate, Costly, and Inefficient

Evidence That America's Voter Registration System Needs an Upgrade

Our democratic process requires an effective system for maintaining accurate voter registration information. Voter registration lists are used to assign precincts, send sample ballots, provide polling place information, identify and verify voters at polling places, and determine how resources, such as paper ballots and voting machines, are deployed on Election Day. However, these systems are plagued with errors and inefficiencies that waste taxpayer dollars, undermine voter confidence, and fuel partisan disputes over the integrity of our elections.

Voter registration in the United States largely reflects its 19th-century origins and has not kept pace with advancing technology and a mobile society. States' systems must be brought into the 21st century to be more accurate, cost-effective, and efficient.

Research commissioned by the Pew Center on the States highlights the extent of the challenge:¹

- Approximately 24 million—one of every eight—voter registrations in the United States are no longer valid or are significantly inaccurate.
- More than 1.8 million deceased individuals are listed as voters.
- Approximately 2.75 million people have registrations in more than one state.

Meanwhile, researchers estimate at least 51 million eligible U.S. citizens are unregistered, or more than 24 percent of the eligible population.²



One reason for these problems is that many of us are unlikely to live in one voting precinct all our lives:

- About one in eight Americans moved during the 2008 and 2010 election years.³
- Some Americans—including those serving in the military, young people, and those living in communities affected by the economic downturn—are even more transient. For example, census and other data indicate that as many as one in four young Americans moves in a given year.⁴

At a time when government budgets are significantly strained, our antiquated paper-based system remains costly and inefficient.

- A study Pew conducted with Oregon found that, in 2008, state and local taxpayers spent \$4.11 per active voter to process registrations and maintain a voter list, or \$7.67 per transaction (new or updated registrations).⁵

- Canada, which uses modern technology to register people as well as data-matching techniques common in the private sector, spends less than 35 cents per voter to process registrations, and 93 percent of its eligible population is registered.⁶
- Maricopa County, AZ—which includes Phoenix and has a larger population than 23 states—saved more than \$1 million over five years by providing online voter registration, reducing the county's dependence on paper and manual data entry. Printing costs were reduced 75 percent. Each online registration costs an average of 3 cents to process, compared with 83 cents per paper form.⁷

These findings underscore the need for states to improve accuracy, cost-effectiveness, and efficiency.

As described in the previous report, *Upgrading Democracy: Improving America's Elections by Modernizing States' Voter Registration Systems*, Pew is working with election officials, academics, and technology specialists to help states improve their registration systems. Participating states will establish new ways for voters to submit information online and join together to compare registration lists with more data sources, using proven, secure matching techniques and technology to increase data accuracy.

Unregistered citizens

at least

51 million

or **nearly 1 in 4** eligible citizens are not registered to vote.



That's more than **24%** of the eligible population.

ACCURACY

NEW EVIDENCE REVEALS MAJOR PROBLEMS

The paper-based processes of most registration systems present several opportunities for error. In a typical system, election officials get information about a voter's identity, eligibility, address, and contact information through a form completed at a public agency, such as a county election office or motor vehicles office, or through an unregulated third-party voter registration group, such as a campaign or advocacy organization. These are sent to election offices, where the data often are manually entered and names are added to the voter list. A voter must supply any change to that information, such as a new address, name, or party affiliation, which is usually manually entered and processed by election officials. The inability of this paper-based process to keep up with voters as they move or die can lead to problems with the rolls, including the perception that they lack integrity or could be susceptible to fraud.⁸

The Pew Center on the States commissioned RTI International, a prominent nonprofit, nonpartisan research institute, to assess the quality and accuracy of state voter registration lists in the United States. RTI used a unique database maintained by Catalist, LLC, a leading aggregator and processor of voter information, to estimate the number of

records that are inaccurate or no longer valid. For this report, a “no longer valid” record represents a person who is on the rolls but no longer eligible to cast a vote, likely due to having moved or died. An “inaccurate” record represents an eligible voter whose file has incorrect data.

Catalist regularly updates its database for all 50 states and the District of Columbia, thus providing a sound basis for making national-level estimates of no longer valid and inaccurate records, duplicate registrations, and other important measures of list quality. The organization buys voter lists from states and local governments, and combines that information with data from other public and commercial sources, such as the National Change of Address database run by the U.S. Postal Service,

Voter Registration Inaccuracies

approximately

24 million

or **1 in 8** registrations are significantly inaccurate or no longer valid.



1.8 million



deceased individuals are listed as voters.

12 million

records contain an incorrect address.

death records from the Social Security Administration, and lists from marketing firms and retailers used by commercial data aggregators. Catalist applies a complex matching process to combine and analyze data to verify or update records of voters.

The resulting database contains a robust set of profiles of American voters and nonvoters built from registration lists and expanded upon with more information. Because not all states provide complete records, an analysis of Catalist's data likely underestimates the number of inaccurate and no longer valid records.⁹

Inaccurate or no longer valid records

The study found millions of voter registration records nationwide that are either inaccurate or no longer valid. These were identified based on data indicating a voter died, moved, or had been inactive from 2004 to March 2011.

VOTERS REGISTERED IN MORE THAN ONE STATE

Number of states in which a voter is registered	Number of people
2	2,688,046
3	68,725
more than 3	1,807
total	2,758,578

The study identified:

- Approximately 12.7 million records nationwide that appear to be out of date and no longer reflect the voter's current information.
- More than 1.8 million records for people who are no longer living, but have registrations on voter rolls.
- About 12 million records with incorrect addresses, indicating that either the voters have moved, or that errors in the information on file make it unlikely the Postal Service can reach them.¹⁰

Once duplicates among categories are eliminated, approximately 24 million registration records, or nearly 13 percent of the national total, are estimated to be inaccurate or no longer valid.¹¹

Duplicate registrations

Matching voter information, such as name, age, and other attributes, with data from sources such as the National Change of Address filings makes it possible to estimate the number of people who appear to hold registrations in more than one state.

A voter could become registered in multiple states when she moves and reregisters—legally—without notifying her former state. Notice of this information would help a state keep accurate rolls by verifying residence and eligibility.

This study found that almost 2.7 million people appear to be registered in two states, and more than 70,000 people could be registered in three or more. In all, more than 2.75 million people appear to have multiple registrations.

These findings are consistent with other research. In the 2008 general election, 2.2 million votes were lost because of registration problems, according to a survey by researchers at the California Institute of Technology/Massachusetts Institute of Technology Voting Technology Project.¹² Additionally, 5.7 million people faced a registration-related problem that needed to be resolved before voting, according to the Cooperative Congressional Election Study.¹³ Two recent studies also found that 8 percent to 12 percent of registration records contain errors.¹⁴

In 2008, Oregon and Washington compared their registration records employing a more sophisticated data-matching technique than states currently use. They discovered slightly more than 8,000 potential matches between the voters of the two states.¹⁵

COST

FIRST-OF-ITS-KIND STUDY PROVIDES IN-DEPTH MEASURES

Costs for printing and processing forms, handling returned mail from inaccurate records, maintaining registration databases, and other expenses add millions of dollars to state and local budgets at a time when government offices are struggling to deliver the highest value for every taxpayer dollar.

Registration costs are difficult to determine and analyze because state laws vary and the division of election-administration responsibilities between state and local officials can differ. As officials continue to offer new and innovative ways to participate in elections, evaluating and comparing administrative costs has become a challenging but important exercise.

The Oregon case study

Working closely with state and local election officials, Pew conducted a first-of-its-kind assessment of registration costs, at every level of government, in a single state.¹⁶

Once duplicates among categories are eliminated, approximately **24 million registration records**, or nearly 13 percent of the national total, are estimated to be **inaccurate or no longer valid**.

Pew asked Oregon's state election officials and its 36 county clerks to isolate their registration expenses from other costs related to conducting elections for 2008.

The cost estimates of the counties, secretary of state's office, and state agencies were added to determine a statewide cost. This total was divided by the number of registered voters for the 2008 general election to determine the cost per voter, and by all new and updated registrations recorded in Oregon's centralized system to determine a cost per transaction.

The study found that registration in Oregon cost taxpayers more than \$8.8 million during the 2008 election—more than \$4.11 per active voter registered, or \$7.67 per registration transaction.¹⁷

Costs in U.S. 12 times higher than in Canada

The costs of maintaining a voter list in the United States are high when compared with our neighboring democracy, Canada, which spends only 35 cents per active voter to create and maintain its lists in a federal election year—one-twelfth the cost in the U.S.

According to a survey of election budgets in the United States conducted by the Caltech/MIT Voting Technology Project, county and local election offices spend approximately one-third of their budgets just on voter registration.¹⁸ In some jurisdictions, the total is even higher.

Wyoming spends \$1 million per year on the vendor contract for its statewide registration database. With a quarter of a million active voters in the state, Wyoming is spending \$4 per active voter just on maintaining its database, before other registration costs are considered.¹⁹

These costs do not include the millions spent every election cycle by advocacy groups, community organizations, and political campaigns to register voters outside the direct supervision of election officials,²⁰ or what such groups spend on private vendors to update lists rife with errors.

EFFICIENCY

VOTERS AND OFFICIALS COPE WITH AN OUTMODED SYSTEM

Election officials administer a system that is fundamentally inefficient in a number of ways:

- They generally do not have access to modern data-matching techniques used by private industry and other government agencies to compare records to readily available databases and minimize inaccuracies caused by Americans' mobility.
- They are relegated to reacting to incoming information from voters and third-party organizations, if it comes to them at all. Additionally, much of it is presented with inaccuracies and in

a concentrated period right before an election, when they are responsible for all other aspects of election administration.

- They typically receive information on paper that must be entered manually into the voter systems, greatly increasing the potential to introduce errors.

Millions of Americans are unaware of these problems. According to the Cooperative Congressional Election Study (CCES), the largest national survey of voter experiences, one in four voters interviewed about Election Day 2008 assumed that election officials or the U.S. Postal Service update registrations automatically with each move,²¹ even though that is almost never the case. The same survey found that more than half of voters were unaware that they could revise their registration information at state motor vehicle agencies, as mandated in the vast majority of states by the National Voter Registration Act (NVRA).²²

Still, even among those who try to register at a motor vehicles agency, the results are mixed, at best. For example, nearly 25 percent of those who attempted to register at a Maryland Motor Vehicle Administration office in 2007-2011 did not make it onto the state's voter rolls.²³ In Ohio, while requesting improved NVRA compliance from Ohio's Bureau of Motor Vehicles, the secretary of state noted that:

“... from 2007-2008 only 9.6% of all driver license transactions resulted in a

voter registration transaction and... while driver license transactions increased, voter registration transactions fell to only 6.5% of all driver license transactions from 2009-2010.”²⁴

Additionally, in 2008, more than two million provisional ballots—issued when a voter encounters a problem at the polls—were cast, requiring election officials to verify each voter's eligibility and determine whether their vote counted. Almost half of the uncounted ballots for which there are detailed data were rejected because the voter was not on the registration rolls.²⁵

The problems with the current system

According to data from CCES, people who moved within the two years preceding an election are most likely to have registration-related difficulties at the polls.²⁶ Mobility issues particularly affect military personnel—especially those deployed overseas and their families—who were almost twice as likely to report registration problems as was the general public in 2008.²⁷

Clark County, NV, which includes Las Vegas and has been particularly hard hit by home foreclosures, is a good example of the burden mobility puts on election officials. In a six-month period, spanning the end of 2009 and the beginning of 2010, more than 150,000 of its nearly 700,000 active registered voters—more than 20 percent—moved from the address on file with the county election office.²⁸

Data released by the U.S. Election Assistance Commission in 2011 emphasize the inefficiencies resulting from our current system. The data show that the most common reason for removing a person from the voter rolls is not that the person provided new information, but merely that they did not vote for two consecutive election cycles.²⁹ In other words, officials must react to the *absence* of information.

The burden of last-minute, third-party information

Third-party organizations are most active close to an election, and thus submit millions of paper applications just before registration deadlines.³⁰ Voter lists rely upon the information solicited by these groups, but if a voter moves, election officials are unlikely to learn of it, if at all, until immediately before the next registration deadline, when paper forms again flood election offices.

Far too often, the submitted registration forms are incomplete, or present duplicate or conflicting information.³¹ In response, local election officials must redirect limited resources to hiring large numbers of temporary data-entry staff to manually process and verify applications. This comes at a particularly busy time when other tasks, such as recruiting and training poll workers and preparing for Election Day, must be done.

Eligible citizens who remain unregistered

As difficult as it is for election officials to keep up with voters who are on the rolls, the system is similarly inefficient in getting people onto them in the first place. RTI compared the registered-voter data it analyzed from Catalist with estimates of the total U.S. voting-eligible population.³² RTI determined that it could quantify the number of people who are eligible but not listed on the rolls. The data indicate that at least 51 million citizens appear to be unregistered in the United States, or more than 24 percent of the eligible population. Conversely, Canada, which uses innovative technology and data-matching methods, has 93 percent of its eligible voters on the rolls.³³

IMPROVING VOTER REGISTRATION LISTS

The Pew Center on the States is working with states to upgrade voter registration systems to improve the accuracy of records, streamline processes, and save money, while enhancing the rolls' integrity. This effort builds on initiatives already in place in some jurisdictions.

With guidance from a working group of 42 experts, including election officials, academics, and technology specialists

from more than 20 states, Pew developed a comprehensive plan that uses methods already in place in the private sector and other areas of government to modernize voter registration. The approach consists of three core elements:

1. Comparing registration lists with other data sources to broaden the base of information used to update and verify voter rolls.
2. Using proven data-matching techniques and security protocols to ensure accuracy and security.
3. Establishing new ways voters can submit information online and minimize manual data entry, resulting in lower costs and fewer errors.

By combining these elements, states can phase out many laborious, wasteful, and error-prone procedures and use

sophisticated technology to improve the accuracy, integrity, and cost-effectiveness of the registration process.

Learn more about Pew's plan for modernizing state voter registration systems in our report, *Upgrading Democracy: Improving America's Elections by Modernizing States' Voter Registration Systems*.

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Endnotes

1 The Pew Center on the States commissioned RTI International, a nonprofit, nonpartisan research institute, to assess the quality and accuracy of state voter registration lists in the United States using a database maintained by Catalist, LLC, a leading aggregator and processor of voter information.

2 Ibid.

3 See: U.S. Census Bureau, "Mover Rate Reaches Record Low, Census Bureau Reports," Nov. 15, 2011.

4 U.S. Census Bureau, "Geographic Mobility: 2011," November 2011, <http://www.census.gov/hhes/migration/data/cps/cps2011.html>.

5 For the full report, see: *The Real Cost of Voter Registration: An Oregon Case Study* (Washington DC: Pew Center on the States, March 2010); http://www.pewcenteronthestates.org/report_detail.aspx?id=56478.

6 Pew Center on the States e-mail correspondence with Rennie Molnar, associate deputy director chief

electoral officer, Elections Canada, December 3, 2009. Additional context information was presented in: Rennie Molnar, “Operational Aspects of Canada’s National Register of Electors,” PowerPoint presentation given at *Voter Registration Modernization: A Case Study of the Canadian Systems of Voter Registration*, a meeting hosted by the Pew Center on the States in cooperation with the International Foundation for Electoral Systems, Toronto, Canada, June 4-5, 2009.

7 Matt Barreto, Loren Collingwood, Bonnie Glaser, Karin Mac Donald, Francisco Pedraza and Barry Pump, *Online Voter Registration (OVL) Systems in Arizona and Washington: Evaluating Public Usage, Public Confidence and Implementation Processes* (Washington, DC: Pew Center on the States, April 1, 2010), 93.

8 See Tom Wroblewski, “City Board of Elections seeks to clear ineligible voters from its rolls,” *Staten Island Today*, August 17, 2011; http://www.silive.com/news/index.ssf/2011/08/city_board_of_elections_seeks.html and Quin Monson, “Children and Dead People are NOT Voting in Utah,” *Utah Data Points*, August 16, 2011; <http://utahdatapoints.com/2011/08/children-and-dead-people-are-not-voting-in-utah/>.

9 States store and process registration data differently, and often restrict the amount of data provided to Catalist to protect a voter’s privacy; for example, some states provide only month and year for date of birth rather than the full date. Many official records that could contain inaccuracies, or might identify a voter as having moved or died, could thus go unidentified because the original file does not contain enough data to match with confidence to updated information from other sources. Such a record would be considered accurate and active until more data might indicate otherwise.

10 Catalist uses classifications established by the U.S. Postal Service to gauge address accuracy and mailability. The Postal Service has six categories for addresses, from the most accurate information to information that cannot be verified, including: “mailable” to “possibly deliverable” to “unverified.” The final category denotes that no mailability information is available in the Postal Service’s master list of addresses.

11 Many voter records fall into two or more of the problematic categories we examined, which is why the number of problematic records is less than the sum of each of the subcategories.

12 R. Michael Alvarez, Stephen Ansolabehere; Adam Berinsky; Gabriel Lenz; Charles Stewart III and Thad Hall, “2008 Survey of the Performance of American Elections, Final Report” (2008). Available at <http://www.pewcenteronthestates.org/uploadedFiles/Final%20report20090218.pdf>.

13 Stephen Ansolabehere, “Voting Experiences,” PowerPoint presentation, July 30, 2009. This presentation reported findings originally published in the Cooperative Congressional Election Study (Cambridge, MA: Common Content, Release 1, 2009).

14 Stephen Ansolabehere and Eitan Hersh, “The Quality of Voter Registration Records: A State-by-State Analysis,” (Cambridge, MA: Harvard University, 2010); Stephen Ansolabehere, Eitan Hersh, Alan Gerber and David Doherty, “Voter Registration List Quality Pilot Studies: Report on Detailed Results and Report on Methodology,” (Washington, DC: Pew Center on the States, June 8, 2010).

15 R. Michael Alvarez, Jeff Jonas, William E. Winkler and Rebecca N. Wright, *Interstate Voter Registration Database Matching: The Oregon-Washington 2008 Pilot Project*, (Pasadena, CA: California Institute of Technology/Massachusetts Institute of Technology Voting Technology Project, August 10, 2009) 3. Available at http://www.vote.caltech.edu/drupal/files/working_paper/wp_84_pdf_4acf7a043a.pdf.

16 For the full report, see *The Real Cost of Voter Registration: An Oregon Case Study* (Washington DC: Pew Center on the States, March 2010); http://www.pewcenteronthestates.org/report_detail.aspx?id=56478.

17 Costs incurred by Oregon counties to register people and maintain the voter list included mailings and notices to voters; full-time and part-time staff; facilities and county administrative support; telephones; faxes; and desktop computers. State costs included allocating the costs spent on registration of personnel at the secretary of state’s office and

assisting agencies under the National Voter Registration Act such as the Department of Motor Vehicles and the Department of Human Services, support and maintenance of the centralized registration system, printing and distribution of registration cards, maintenance of a Web site where voters can check the status of their registration, and other expenditures. The technology costs principally involve maintaining and supporting the centralized registration system.

18 Caltech/MIT Voting Technology Project, Voting: What Is, What Could Be, July 1, 2001, 51; <http://www.vote.caltech.edu/drupal/node/10>.

19 Peggy Nighswonger, state election director Wyoming Secretary of State Office, personal communication, Feb. 10, 2010.

20 Elizabeth Williamson and Brody Mullins, “Democratic Ally Mobilizes in Housing Crunch,” *The Wall Street Journal*, July 31, 2008; <http://online.wsj.com/article/SB121745181676698197.html>.

21 *Cooperative Congressional Election Study* (Washington, DC: The Pew Charitable Trusts Content, 2008).

22 Ibid.

23 Annie Linskey, “Nearly 25 percent of MVA voter registrations fail,” *The Baltimore Sun*, February 20, 2011.

24 Jon Husted, Ohio Secretary of State, letter to Thomas P. Charles, director, and Mike Rankin, registrar, Ohio Department of Public Safety, August 16, 2011.

25 “Provisional Ballots: An Imperfect Solution” (Washington, DC: Pew Center on the States, July 2009); http://www.pewcenteronthestates.org/initiatives_detail.aspx?initiativeID=54789.

26 *Cooperative Congressional Election Study* (Cambridge, MA: Common Content, Release 1, 2009).

27 *Cooperative Congressional Election Study* (Washington, DC: Pew Charitable Trusts Content, 2008).

28 Harvard Lomax, registrar of Clark County, NV, personal communication, April 30, 2010; and Harvard Lomax, “Inactivation of Voters in Clark County,” Memorandum—Election Department, Nevada Secretary of State, March 12, 2010.

29 Fully 40 percent of people removed from state lists were removed for failure to vote, according to data compiled by the U.S. Election Assistance Commission. The second-highest reason for removal—moved outside of jurisdiction—comes in around 25 percent. See *The Impact of the National Voter Registration Act of 1993 on the Administration of Elections for Federal Office 2009-2010* (Washington, DC: U.S. Election Assistance Commission, June 30, 2011); table 4b.

30 Michael Falcone and Michael Moss, “Group’s Tally of New Voters Was Vastly Overstated,” *The New York Times*, October 23, 2008; <http://www.nytimes.com/2008/10/24/us/politics/24acorn.html>. Additionally, Rock the Vote said it helped 2.6 million people to register via its “online tool, grassroots efforts and direct mail” efforts in 2008. See also <http://www.rockthevote.com/about/rock-the-vote-2008-program/>.

31 Stephen Ansolabehere, David Doherty, Alan Gerber, and Eitan Hersh, *Voter Registration List Quality Pilot Studies: Report on Detailed Results* (Washington, DC: Pew Center on the States, June 8, 2010).

32 The estimates of voting-eligible population are produced by Michael McDonald at George Mason University, and are available at his United States Elections Project website at <http://elections.gmu.edu/index.html>. McDonald estimates the voting-eligible population by taking into account voting age, non-citizenship rates, felony disenfranchisement, and other factors.

33 Molnar, “Operational Aspects of Canada’s National Register of Electors,” PowerPoint presentation given at *Voter Registration Modernization: A Case Study of the Canadian Systems of Voter Registration*, Toronto, Canada, June 4-5, 2009.

Pew's Elections Initiatives supports innovative research and partnerships to achieve the highest standards of accuracy, cost-effectiveness, convenience, and security in America's system of election administration.

The Pew Center on the States is a division of The Pew Charitable Trusts that identifies and advances effective solutions to critical issues facing states. Pew is a nonprofit organization that applies a rigorous, analytical approach to improve public policy, inform the public, and stimulate civic life.

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